

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF
GREATER ST. LOUIS, et al.,

Plaintiffs,

v.

COLONIAL RUG CO.,

Defendant.

Case No. 4:05CV126MLM

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant in the amount of \$43,624.31, which consists of \$22,137.92 in delinquent contributions owed through April 3, 2005, \$4,211.87 in liquidated damages, \$1,584.78 in interest and \$15,689.74 as the balance of an unpaid loan.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3 and 4, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- 1) \$5,000.00 on or before September 25, 2005;
- 2) \$1,900.00 on or before October 25, 2005;
- 3) \$1,900.00 on or before November 25, 2005;
- 4) \$1,900.00 on or before December 25, 2005;
- 5) \$1,900.00 on or before January 25, 2006;
- 6) \$1,900.00 on or before February 25, 2006;
- 7) \$1,900.00 on or before March 25, 2006;

- 8) \$1,900.00 on or before April 25, 2006;
- 9) \$1,900.00 on or before May 25, 2006;
- 10) \$1,900.00 on or before June 25, 2006;
- 11) \$1,900.00 on or before July 25, 2006;
- 12) \$1,900.00 on or before August 25, 2006;
- 13) \$1,900.00 on or before September 25, 2006;
- 14) \$1,900.00 on or before October 25, 2006;
- 15) \$1,900.00 on or before November 25, 2006;
- 16) \$1,900.00 on or before December 25, 2006;
- 17) \$1,900.00 on or before January 25, 2007;
- 18) \$1,900.00 on or before February 25, 2007;
- 19) \$1,900.00 on or before March 25, 2007; and
- 20) \$489.74 on or before April 25, 2007.

4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party, or to which defendant becomes party during the period set forth in paragraph 3, above.

5. This Stipulation will not be filed with the U.S. District Court unless defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit its reports and contributions as required by paragraph 4, above, in which event the entire judgment amount, less any payments made, shall become immediately due. If defendant complies with paragraph 3 and 4, above, then payment of the amount referenced in paragraph 3 shall satisfy this judgment.

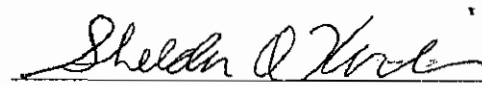
6. The parties acknowledge that this Stipulation is based upon un-audited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts. The aforesaid audit may be performed by plaintiffs at their cost at a time of their choosing during normal business hours, by giving at least seven (7) days' notice.

7. This Stipulation for Entry of Consent Judgment covers all known amounts owed by defendant to plaintiff through July 31, 2005. Therefore, except as provided in paragraph 6, above, pertaining to additional amounts discovered through a subsequent audit, compliance with this Stipulation for Entry of Consent Judgment will completely satisfy and resolve all claims by plaintiffs against defendant for all time periods through July 31, 2005.

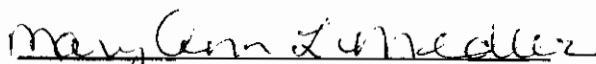
WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

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SO ORDERED:


UNITED STATES Magistrate JUDGE

Dated: May 23, 2006